

**MICHIGAN PRE-REMEDIAL SITE ASSESSMENT COOPERATIVE AGREEMENT
OTHER CLEANUP AUTHORITY REPORT
STATE LEAD/OVERSIGHT ACTIVITIES AT PRE-REMEDIAL OCA SITES**

Reporting Period: FY13, Q1 & Q2

Date: 8/16/2013

CA Title: MDEQ-Pre-Remedial Program (ZZ)

CA#: V00E00778-0

Activity: Other Cleanup Authority

OTHER CLEANUP AUTHORITY REPORTING REQUIREMENT:

As a new condition of the current Michigan Department of Environmental Quality (MDEQ) Pre-Remedial Program cooperative agreement (CA), progress on all sites that have been given an Other Cleanup Authority (OCA) designation needs to be reported on a yearly basis. As agreed to by the United States Environmental Protection Agency (U.S. EPA) and the MDEQ for the OCA designation of the Wolverine Worldwide Former Tannery site, the MDEQ has completed this OCA report for this site for the former reporting period.

OCA SITE LIST:

<u>Site Name</u>	<u>County</u>	<u>U.S. EPA ID No.</u>
Wolverine Worldwide Former Tannery	Kent	MIN000510613

SITE: Wolverine Worldwide Former Tannery

Current Activities:

The Wolverine Worldwide Former Tannery site (Site) was designated as OCA status on June 15, 2012 after completion of a Preliminary Assessment. This designation was given in part due to a commitment from Wolverine Worldwide, Inc. (Wolverine), documented in a letter to the MDEQ dated June 11, 2012, where the company committed to working with the MDEQ under Section 14b of Part 201 with regard to response actions on the site.

Prior to the beginning of additional investigative work, the community group, Concerned Citizens for Responsible Redevelopment (CCRR) submitted a letter to the MDEQ on October 24, 2012 wherein CCRR raised key concerns to the MDEQ before any new site investigation work was planned or completed. The MDEQ met with Wolverine representatives on October 31, 2012 to discuss further site investigation expectations.

CCRR and the West Michigan Environmental Action Council (WMEAC) have attempted to form a Citizens Advisory Group (CAG). In a meeting on December 14, 2012, these groups met with the MDEQ and Wolverine regarding the upcoming work on the Site. The groups proposed all parties participate in an Environmental Conflict Resolution process but this process was not adopted and Wolverine proposed forming a community group that would receive site information as it became available. No official CAG has been formed.

As part of the investigation work, Wolverine submitted a work plan to the MDEQ for additional activities on December 14, 2012. The MDEQ approved the plan on December 18, 2012. In January and February of 2013, Wolverine's consultant installed and sampled additional monitoring wells and collected some soil samples for analysis.

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The results of this sampling were discussed at a meeting with the MDEQ on April 19, 2013 along with reasons for postponing some of the planned work due to high water levels. One of the results was that during the installation of temporary borings in the area north of Rum Creek and east of the bike path, leather scraps and partial hides were encountered. As a result of these findings, supplemental work has been proposed.

On March 28, 2013, WMEAC submitted a letter to "Interested Parties" regarding their concerns with the ongoing work at the Site. On April 17, 2013, CCRR requested a response to these concerns. The MDEQ responded to these concerns via electronic mail on July 1 and 2, 2013.


On April 30, 2013, the Kent County Conservation District sent a letter to the MDEQ in support of the thorough remediation of the Site and any associated sites. Their board expressed concern about demolition methods used and petitioned involvement of the U.S. EPA.

During the week of April 29, 2013, Wolverine submitted a new work plan for MDEQ approval which provides for an expanded effort to determine the extent of the leather scraps and hides and to perform additional groundwater and soil sampling to determine what, if any, impact the leather and hides may have on soil and groundwater in that area. Wolverine has also proposed additional soil sampling to better define the extent of contamination in two areas where soil excavation is proposed. This supplemental work, along with the balance of the work from the December 2012 plan that was postponed, is currently under way.

Wolverine has committed to a meeting with a group of community members (including WMEAC, the city of Rockford, and the MDEQ) after they have completed their report on their current work. This community group meeting will likely be scheduled in late September or early October 2013.

Prepared by: 
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Date: 8/16/13

Approved by: 
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Date: 8/16/13